

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

| | | |
|---|---|-------------------------|
| (1) MARCILLA NICOLE CULTRERA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. CIV-18-117-RAW |
| |) | |
| (1) THE OKLAHOMA DEPARTMENT OF |) | |
| CORRECTIONS, a Governmental Agency; |) | |
| (2) THE OKMULGEE COUNTY CRIMINAL |) | |
| JUSTICE AUTHORITY, a component of |) | |
| Okmulgee County; and |) | |
| (3) KELLY WEST, individually and in his |) | |
| Official Capacity with the Oklahoma |) | |
| Department of Corrections, |) | |
| |) | |
| Defendants. |) | |

DEFENDANT OCCJA'S WITNESS LIST

Pursuant to the Court's Scheduling Order (Doc. 26), Defendant Okmulgee County Criminal Justice Authority ("OCCJA"), in the above-styled case submits the following Witness List:

1. Karolina Boulet
Muskogee County Sheriff's Office
220 State St
Muskogee, OK 74401
Phone: (918) 682-7851
Is the Jail Administrator for the Muskogee County Detention Center; may testify to refute Plaintiff's claim that she attempted to gain employment at the Muskogee County Sheriff's Office and/or Muskogee County Detention Center
2. Corporate Representative
National Mortgage Field Services
P.O. Box 244
Weston, TX 75097
Phone: (903) 267-1767
Is the designated corporate representative for National Mortgage Field Services; may testify to refute Plaintiff's claim that she attempted to gain employment at Mortgage Field Services

3. Steve Dennis
ACME Engineering & Manufacturing Corporation
1820 N. York St
Muskogee, OK 74401
Phone: (918) 684-0593
Is the Human Resources Manager for ACME; may testify to refute Plaintiff's claim that she attempted to gain employment at ACME
4. Kristy Fisher
Arvest Bank
500 Rogers Ave.
Fort Smith, AR 72903
Phone: (479) 573-1471
Is the Subpoena Response Specialist for Arvest Bank; may testify to refute Plaintiff's claim that she attempted to gain employment at Arvest Bank
5. Tobey Hartman
Consolidated Restaurant Operations
12200 Stemmons Fwy. Ste. 100
Dallas, TX 75234
Phone: (972) 888-4222
Is the Director of Human Resources for Consolidated Restaurant Operations; may testify to refute Plaintiff's claim that she attempted to gain employment at the El Chico-Muskogee
6. Miranda Holloway
Wal-Mart Stores, Inc.
702 S.W. 8th Street
Bentonville, AR 72716
Phone: (479) 273-4505
Is the Legal Analyst for Wal-Mart Stores, Inc., Legal Department; may testify to refute Plaintiff's claim that she attempted to gain employment at Wal-Mart
7. Rebecca Hudson
Liberty Credit
25331 IH 10 West #101
San Antonio, TX 78257
Phone: (800) 233-8572
Is the Corporate Secretary/Treasurer for Liberty Credit; may testify to refute Plaintiff's claim that she attempted to gain employment at Liberty Credit

8. Brad W. Kruse
Kruse & Associates
8596 E. 101st Street
Tulsa, OK 74113
Phone: (918) 251-5982
Is the Human Resource Director for Kruse and Associates; may testify to refute Plaintiff's claim that she attempted to gain employment at Anish Hotel Group
9. Laura Lefkovits
Arcon Management Co., LLC
1918 N 11th Street W
Muskogee, OK 74401
Phone: (918) 687-0002
Is an employee at Acron Management; may testify to refute Plaintiff's claim that she attempted to gain employment at Acron Management
10. Merle Loafman
Landmark Cancer Center
913 S. Main Street, Suite 212
Grapevine, TX 76051
Phone: (817) 329-4611
Is the Controller for TVG Capital; may testify to refute Plaintiff's claim that she attempted to gain employment at Landmark Cancer Center
11. Sam McCoy
c/o Ambre Gooch
Collins, Zorn & Wagner
429 NE 50th Street, Second Floor
OKC, OK 73105
Phone: (405) 524-2070
Is the Executive Director for the Okmulgee County Law Enforcement Center; may testify to refute Plaintiff's allegations in this case; may testify regarding his communications with, statements made by, and observations of Plaintiff; may testify regarding the basis for the employment actions and decisions he took or made with respect to the Plaintiff; may testify regarding Plaintiff's job performance and job duties
12. Valerie Medina
IBC Bank
P.O. Drawer 1359
Laredo, TX 78042
Phone: (956) 722-7611
Is an employee for IBC Bank; may testify to refute Plaintiff's claim that she attempted to gain employment at IBC Bank

13. Nick Moore
Consolidated Restaurant Operations
12200 Stemmons Fwy. Ste. 100
Dallas, TX 75234
Phone: (972) 888-4222
Is the Director of Human Resources for Consolidated Restaurant Operations; may testify to refute Plaintiff's claim that she attempted to gain employment at the El Chico-Muskogee
14. Patricia Morgan
Chandler Road Donuts
3425 Chandler Rd
Muskogee, OK 74403
Phone: (918) 687-7700
Is the Bookkeeper for Chandler Road Donuts; may testify to refute Plaintiff's claim that she attempted to gain employment at Chandler Road Donuts
15. Galian Murphy
c/o Ambre Gooch
Collins, Zorn & Wagner
429 NE 50th Street, Second Floor
OKC, OK 73105
Phone: (405) 524-2070
Is the Chief Security Officer for the Okmulgee County Law Enforcement Center; may testify to refute Plaintiff's allegations in this case; may testify regarding his communications with, statements made by, and observations of Plaintiff; may testify regarding the basis for the employment actions and decisions he took or made with respect to the Plaintiff; may testify regarding Plaintiff's job performance and job duties
16. Brandy Nugent
Brinker International Payroll Co., LP
6820 LBJ Freeway
Dallas, TX 75240
Phone: (972) 770-9047
Is the Payroll Specialist for Brinker International Payroll Co.; may testify to refute Plaintiff's claim that she attempted to gain employment at Brinker International Payroll
17. Rebecca Oliver
American Lenders
2800 W. Broadway
Muskogee, OK 74401
Phone: (918) 682-9037 ext. 105
Is the Branch Manager for American Lenders; may testify to refute Plaintiff's claim that she attempted to gain employment at American Lenders

18. Cheryl O'Rourke
Red River Credit
357 Jacob St.
P.O. Box 130
Timpson, TX 75975
Phone: (936) 254-1900 ext. 202
Is the Payroll/HR Manager for Red River Credit; may testify to refute Plaintiff's claim that she attempted to gain employment at Red River Credit
19. Shawnda Pruitt
c/o Ambre Gooch
Collins, Zorn & Wagner
429 NE 50th Street, Second Floor
OKC, OK 73105
Phone: (405) 524-2070
Is a Captain at the Okmulgee County Law Enforcement Center; may testify to refute Plaintiff's allegations in this case; may testify regarding her communications with, statements made by, and observations of Plaintiff; may testify regarding the basis for the employment actions and decisions she took or made with respect to the Plaintiff; may testify regarding Plaintiff's job performance and job duties
20. Machel Price
McCall Dental Studio
2214 Chandler Road
Muskogee, OK 74403
Phone: (918) 686-6527
Is the Office Manager for McCall Dental Studio; may testify to refute Plaintiff's claim that she attempted to gain employment at the McCall Dental Studio
21. Kristen Sampo
Office Depot, Inc.
6600 North Military Trail
Boca Raton, FL 33496
Phone: (561) 438-4800
Is the Employment Law Vice President for Office Depot, Inc.; may testify to refute Plaintiff's claim that she attempted to gain employment at Office Depot
22. The Springs
c/o Gina Cheatham
4550 Will Rogers Parkway, Suite 380
Oklahoma City, OK 73108
Phone: (405) 943-6444
Is an attorney that represents The Springs; may testify to refute Plaintiff's claim that she attempted to gain employment at The Springs

23. Ron Spears
c/o Ambre Gooch
Collins, Zorn & Wagner
429 NE 50th Street, Second Floor
OKC, OK 73105
Phone: (405) 524-2070
Is the Deputy Warden for the Okmulgee County Law Enforcement Center; may testify to refute Plaintiff's allegations in this case; may testify regarding his communications with, statements made by, and observations of Plaintiff; may testify regarding the basis for the employment actions and decisions he took or made with respect to the Plaintiff; may testify regarding Plaintiff's job performance and job duties
24. Michael D. Shaw
Muscogee Staffing Solutions, LLC
717 South 32nd Street, Suite 3
Muskogee, OK 74401
Phone: (918) 910-5235
Is an employee for Muscogee Staffing Solutions, LLC; may testify to refute Plaintiff's claim that she attempted to gain employment at Muscogee Staffing Solutions, LLC
25. Judi Twiggs
Tinker Federal Credit Union
P.O. Box 45750
Tinker Air Force Base, OK 73145
Phone: (405) 732-0324
Is paralegal for Tinker Federal Credit Union; may testify to refute Plaintiff's claim that she attempted to gain employment at Tinker Federal Credit Union
26. Kelly West
c/o Kevin L. McClure
Oklahoma Attorney General's Office
313 N.E. 21st Street
OKC, OK 73105
Phone: (405) 524-2070
Is a named Defendant in this case; may testify to refute Plaintiff's allegations in this case
27. Stephanie Whyburn
Kruse & Associates
8596 E 101st St H
Tulsa, OK 74133
Phone: (918) 251-5982
Is a Human Resources employee for Kruse & Associates; may testify to refute Plaintiff's claim that she attempted to gain employment at Kruse and Associates

28. Kathy Wilkinson
Arrowhead Mall
501 N. Main Street, Suite 99
Muskogee, OK 74401
Phone: (918) 683-4100 x 101
Is the Tenant Service Coordinator for Arrowhead Mall; may testify to refute Plaintiff's claim that she attempted to gain employment at Arrowhead Mall
29. Lisa Zaloudek
Xpress Wellness Urgent Care
1710 West Willow
Enid, OK 73703
Phone: (580) 210-5925
Is the Human Resources Director for Xpress Wellness Urgent Care, Hammer Williams Company, and Williams Broadcasting; may testify to refute Plaintiff's claim that she attempted to gain employment at Xpress Wellness Urgent Care

All witnesses listed by Plaintiff and/or co-Defendants.

Plaintiff's medical care providers, to the extent she is seeking damages for physical, mental, emotional, and/or psychological harm.

Plaintiff's mental care providers, to the extent she is seeking damages for physical, mental, emotional, and/or psychological harm.

All records custodians for records objected to on the basis of authenticity.

The list will be supplemented during discovery or as otherwise required by the Federal Rules of Civil Procedure or the Court's Scheduling Order.

Respectfully submitted,

s/ Taylor M. Tyler
Taylor M. Tyler, OBA No. 33291
Ambre C. Gooch, OBA No. 16586
COLLINS, ZORN, & WAGNER, P.C.
429 N.E. 50th Street, Second Floor
Oklahoma City, OK 73105-1815
Telephone: (405) 524-2070
Facsimile: (405) 524-2078
E-mail: acg@czwlaw.com

ATTORNEY FOR DEFENDANT
OKMULGEE COUNTY CRIMINAL
JUSTICE AUTHORITY

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Brian L. Mitchell, bmitchell@neuensmitchell.net
Sheila M. Sayne, ssayne@neuensmitchell.net
Michael C. Redman, mredman@neuensmitchell.net
NEUENS MITCHELL BONDS PLLC
2021 South Lewis Avenue, Suite 660
Tulsa, OK 74104
Attorneys for Plaintiff

Kevin L. McClure, kevin.mcclure@oag.ok.gov
Assistant Attorney General
Oklahoma Attorney General's Office
Litigation Section
313 N.E. 21st Street
Oklahoma City, OK 73105
Attorney for Defendant Kelly West

Jackie Zamarripa, jackie.zamarripa@oag.ok.gov
Assistant Attorney General
Oklahoma Attorney General's Office
Litigation Section
313 N.E. 21st Street
Oklahoma City, OK 73105
Attorney for Defendant Oklahoma Department of Corrections

s/ Taylor M. Tyler
Taylor M. Tyler